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FIRST CHARTER SPORATION

10200 David Taylor Drive • P.O. Box 37937, 28237-7937 • Charlotte, NC 28262-2373 • (7

June 7, 2004

Lawrence M. Kimbrough President and Chief Executive Officer

> Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

RE: MM Docket No. 99-325

Dear Ms. Dortch:

As a WFAE/WFHE Board member, public radio listener and financial supporter, I urge the FCC to rule that radio stations may use their digital, High Definition signals for secondary, supplemental audio channels.

Listeners come to public radio station because of our programming and the quality of our audio.

HD radio will improve audio quality, but the decisive factor for our station will be the capability to create supplemental audio programming. The station believes the use of supplemental audio is integral to our public service mission and enables us to expand programming to meet listener needs that are either underserved or not served at all.

WFAE and WFHE might use the second channel to time-shift programming that current listeners miss because of their busy schedules or to provide overseas news 24 hours a day. We might use the channel to provide foreign language programming, or we might use the channel to provide music programming, such as folk or alternative, which are not currently available in our service areas.

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Second channels present enormous efficiencies. WFAE and WFHE cannot find any efficient, high power signals in their markets for service expansion under the existing technologies. Public radio stations also need to generate revenue to fund our activities. The potential use of SAC technology for funding purposes will strengthen our ability to continue to serve the public better into the future.

I am most grateful for this opportunity to share my views with members of the Commission.

Thank you.

Sincerely,

Lawrence M. Kimbrough

President and Chief Executive Officer